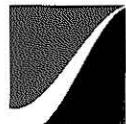


EXHIBIT A



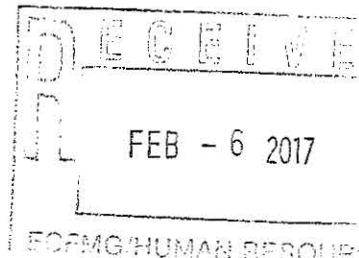
SPIELBERGER
LAW GROUP

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 Jason Allan Watson **♦◊

January 31, 2017

Educational Commission for Foreign Medical Graduates
 Attention: Human Resources Director/General Counsel
 3624 Market Street
 Philadelphia, PA 19104



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RE: Your former employee Robert Voorhees

Dear Sir or Madam:

Robert Voorhees has retained this law firm to represent him in regards to his separation from Educational Commission for Foreign Medical Graduates (hereinafter referred to as "ECFMG"). Please direct all future correspondence, communications, and documents regarding this matter to our firm. The purpose of this letter is to summarize briefly my understanding of what transpired and to determine your interest in engaging in a good faith effort to resolve this matter.

As you know, Mr. Voorhees began working for ECFMG in June 2016. Throughout his tenure with ECFMG, Mr. Voorhees was a hard working employee who diligently performed his duties on a regular basis. Our investigation indicates that ECFMG's treatment and termination of Mr. Voorhees violates federal law.

ECFMG subjected Mr. Voorhees to disparate and discriminatory treatment on the basis of his disability. ECFMG's ongoing hostile work environment exacerbated Mr. Voorhees' disability, requiring him to utilize medical leave. ECFMG terminated Mr. Voorhees without warning following his use of leave in connection with his disability.

Unfortunately, ECFMG's recent conduct and termination of Mr. Voorhees' employment appears to be in direct violation of the Americans with Disabilities Act (ADA), public policy, and company policy. The following statutory language describes the unlawful conduct of an employer as it relates to disability based discrimination claims under the ADA:

29 C.F.R. § 1630.4 Discrimination prohibited.

(a) *In general:*

(1) It is unlawful for a covered entity to discriminate on the basis of disability against a qualified individual in regard to:

OF COUNSEL:

ONLY LICENSED IN:
 + SC
 ‡ GA
 ☀ NJ
 □ VA
 + NC
 * IL
 ☀ TX
 * FL
 ★ AZ
 ♦ PA
 ☁ CO
 ▶ AL



- (i) Recruitment, advertising, and job application procedures;
- (ii) Hiring, upgrading, promotion, award of tenure, demotion, transfer, layoff, termination, right of return from layoff, and rehiring;
- (iii) Rates of pay or any other form of compensation and changes in compensation;
- (iv) Job assignments, job classifications, organizational structures, position descriptions, lines of progression, and seniority lists;
- (v) Leaves of absence, sick leave, or any other leave;¹

42 U.S.C.A. § 12101

(a) *Findings. - The Congress finds that-*

(1) physical or mental disabilities in no way diminish a person's right to fully participate in all aspects of society, yet many people with physical or mental disabilities have been precluded from doing so because of discrimination; others who have a record of a disability or are regarded as having a disability also have been subjected to discrimination.²

In light of ECFMG's conduct, Mr. Voorhees seeks the following: (1) a fair and reasonable settlement for back wages, future wages, non-pecuniary damages, benefits, and attorneys' costs and fees; and (2) a positive letter of reference.

This letter serves as formal notice of your ongoing legal duty to preserve any and all information relevant to the facts surrounding this claim. Your duty to preserve evidence extends to the following: 1) business records, 2) paper, digital, or electronic files, 3) data generated by and/or stored on you or your client's computers and storage media (e.g., hard disks, floppy disks, backup tapes), 4) any other electronic data, such as: voice mails, text messages, emails, digital/analog audio recordings, 5) any related physical evidence, and 6) any form of video recordings (please prevent the automatic deletion of video footage by preprogrammed deletion cycles). Violations of the legal duty described in this notice can result in severe sanctions being imposed by the Court for spoliation of actual evidence or potential evidence.

Please note that our investigation of Mr. Voorhees' claims is ongoing. So that I can document our file, please send me a written response to this letter within five days. Also, please call me at your earliest convenience to discuss your interest in resolving these issues. You can contact me directly at (800) 965-1570 ext. 105.

Best Regards,

A handwritten signature in black ink, appearing to read 'Jeff Del Rio'.

Jeff Del Rio
jeff.delrio@spielbergerlawgroup.com

CC: Elena Adang, Esq.
Robert Voorhees

¹ 29 C.F.R. § 1630.4 (a).

² 42 U.S.C.A. § 12101 (a).

